

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 05-30023-MAP

UNITED STATES OF AMERICA)
)
)
V.)
)
WALTER T. MAY)
Defendant)

MOTION TO MODIFY TERMS AND CONDITIONS
OF DEFENDANT'S RELEASE

Now comes the defendant, Walter May, in the above-entitled matter and respectfully requests that this Honorable Court allow him to modify his terms of release and allow him to go for a CranioSacral therapy appointment with Verena Johanna Smith, at 19 Crosby Avenue, Amherst, MA on January 12, 2007 from 11:30 a.m. to 1:30 p.m., January 19, 2007, January 26, 2007 and February 2, 2007 all beginning at 12:30 p.m. to 2:30 p.m. A letter from Mr. May's neurologist, Dr. Michael Sorrell dated December 5, 2006 (previously filed) states that these weekly appointments are medically necessary. The defendant plans to leave his house at 10:15 a.m. on January 12, 2007 and on January 19, 26 and February 2, 2007 he plans to leave at 11:15 a.m. and expects that he will be back at home on January 12, 2007 by 2:30 p.m. and on January 19, 26 and February 2, 2007 by 3:30 p.m.

BY: /s/ Alan J. Black
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to Todd Newhouse, AUSA and Karen Goodwin, AUSA on this on this 8th day of January 2007.

/s/ Alan J. Black